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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

Hon. James Donato

**DECLARATION OF BRIAN J. DUNNE  
IN OPPOSITION TO OMNIBUS MOTION  
TO SEAL MATERIALS SUBMITTED IN  
CONNECTION WITH CLASS  
CERTIFICATION AND *DAUBERT*  
BRIEFING AND MERITS EXPERT  
PROFFERS IN THE ADVERTISER CASE**

1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States  
3 District Court for the Northern District of California. I am a partner at Bathaee Dunne LLP, counsel for  
4 the Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge of the facts set forth  
5 herein and, if called as a witness, could and would testify competently to them.

6 2. This declaration is made in support of Advertiser Plaintiffs' Opposition to the Omnibus  
7 Motion to Seal Materials Submitted in Connection with Summary Judgment and *Daubert* Briefing in  
8 the Advertiser case ("Sealing Motion"), filed by Defendant Meta Platforms, Inc. ("Meta") on March  
9 14, 2025 (Dkt. 909).

10 3. The specific information Meta seeks to seal and the reason each should not be sealed are  
11 identified in the tables below, with numbered rows for the Court's ease of reference.

12 4. Beyond the individual recitations below, every item that Meta seeks to seal relates to its  
13 violation of the United States antitrust laws, including a monopolization campaign between December  
14 2016 and December 2020 that injured the Advertiser Plaintiffs and a similarly-situated class of Meta  
15 Ads purchasers. There is a significant public interest in information relevant to Meta's violation of the  
16 United States antitrust laws, *see In re Google Play Store Antitrust Litig.*, 2021 WL 4305017, at \*1 (N.D.  
17 Cal. Aug. 18, 2021)—which each of the below-cited items is.

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
<b>Defendant Meta Platforms, Inc.'s Notice of Motion and Motion For Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint</b>			
1	874-1	18:8-9, between "quid pro quo—were" and "and that he had 'no basis to believe that'"	Old – from 2018  Public: <a href="https://techcrunch.com/2018/12/13/facebook-watch-is-finally-growing-as-payouts-get-spread-thin/">https://techcrunch.com/2018/12/13/facebook-watch-is-finally-growing-as-payouts-get-spread-thin/</a>
2	874-1	18:9, between "pulling back from its" and "investment in premium"	Old – from 2018  Public: <a href="https://techcrunch.com/2018/12/13/facebook-watch-is-finally-growing-as-payouts-get-spread-thin/">https://techcrunch.com/2018/12/13/facebook-watch-is-finally-growing-as-payouts-get-spread-thin/</a>

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
3	874-1	18:25, between “own analysis shows that the” and “allegedly at issue in this agreement”	Old – from 2018
4	874-1	19:28, between “claim accounted for just” and “of Meta’s Class Period”	Old – from class period ending in December 2020
<b>Defendant Meta Platforms, Inc.’s Notice of Motion and Motion For Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 1, Excerpts of Expert Merits Report of Michael A. Williams, Ph.D., dated Aug. 5, 2024</b>			
5	874-2	874-2 26 ¶ 59, between “FAN accounts for” and “of Facebook’s advertising Revenues”	Old – from class period ending in December 2020
6	874-2	38 ¶ 94, between “2013 presentation notes that the” and “was generated from local;” between “unsophisticated brands” and “developers and sophisticated brands;” between “developers and sophisticated brands” and “marketers requiring advanced features;” between “marketers requiring advanced features” and “local business;” and after “local business”	Old – from 2013
<b>Defendant Meta Platforms, Inc.’s Notice of Motion and Motion For Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 5, Excerpts of Transcript of Deposition of Tilman Klumpp, held on Mar. 5, 2024</b>			
7	874-6	289:7, between “irrational for Facebook to” and “in -- to make that decision”	Old – from 2018
<b>Defendant Meta Platforms, Inc.’s Notice of Motion and Motion For Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 6, Excerpts of Expert Merits Report of Tilman Klumpp, Ph.D., dated Jan. 12, 2024</b>			
8	874-7	77 ¶ 151, between “others at Facebook, writing:” and “In the same e-mail, Ms. Chang advised that;” between “In the same e-mail, Ms. Chang advised that” and “Ms.	Old – from 2013 and 2014

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
		Chang testified that;” and after “Zuckerberg on April 30, 2014”	
9	874-7	79-80 ¶ 157, after “— expressly addresses”	Old – the effective date of the agreement being discussed was January 15, 2012 and it was later amended in July 2017
10	874-7	80 ¶ 158, after “Microsoft agreed as follows:”	Old – the effective date of the agreement being discussed is May 2012
11	874-7	80 ¶ 158 n.353, before “PALM-008914036-056”	Old – the effective date of the agreement being discussed is May 2012
12	874-7	81 ¶ 159, between “Microsoft agreed to” and “With this agreement in place”	Old – the effective date of the agreement being discussed is May 2012
13	874-7	82 ¶ 164 n.357, between “a January 28, 2015” and “(See PALM-007633377-379.)”	Old – the effective date of the agreement being discussed is in 2015
14	874-7	82-83 ¶ 165 n.358, between “following termination provision:” and “(See PALM-002014487-535”	Old – the effective date of the agreement being discussed is in 2015
15	874-7	84 ¶ 167 n.360, between “at 266” and “PALM-ADI-0001000836-837”	Old – the effective date of the agreement being discussed is in 2013
16	874-7	84-85 ¶ 169 n. 361, between “internal Facebook email describing” and “Bell, K. (January 25;” and after “PALM-FTC-00968368”	Old – from 2019  Public: <a href="https://www.nytimes.com/2019/01/25/technology/facebook-instagram-whatsapp-messenger.html">https://www.nytimes.com/2019/01/25/technology/facebook-instagram-whatsapp-messenger.html</a>
17	874-7	85-86 ¶ 170, between “Directors presentation noted that” and image of “2019 Product Strategy”	Old – from 2018
18	874-7	85-86 ¶ 170, image snip between “and social infrastructure.” and “Source: PALM-FTC-00968366-404”	Old – from 2018 discussing 2019 strategy
19	874-7	85-86 ¶ 170 n.364, after “see PALM-FTC-00967935), at 366”	Old – from 2018
20	874-7	87-88 ¶ 173, image between “MARCH 2019” and “Source: PALM-	Old – from 2019

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		006189416-420”	
<b>Defendant Meta Platforms, Inc.’s Notice of Motion and Motion For Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 10, Excerpts of Transcript of Deposition of Markus Jakobsson, held on Feb. 22, 2024</b>			
21	874-11	239:15-18, between “he would like to get.” and “These are things that”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
<b>Defendant Meta Platforms, Inc.’s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Michael Williams, Exhibit 1, Excerpts of Expert Merits Report of Michael A. Williams, Ph.D., dated Aug. 5, 2024</b>			
22	876-2	38 ¶ 94, between “2013 presentation notes that the” and “was generated from local;” between “unsophisticated brands” and “developers and sophisticated brands;” between “developers and sophisticated brands” and “marketers requiring advanced features;” between “marketers requiring advanced features” and “local business;” and after “local business”	Old – from 2013
<b>Defendant Meta Platforms, Inc.’s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Michael Williams, Exhibit 4, Excerpts of Transcript of Deposition of Scott Fasser, held on Sept. 7, 2023</b>			
23	876-5	181:9, between “I only reviewed the” and “agreements.”	Old – from 2018-2020  There is no compelling reason to seal the fact of an agreement between Facebook and these entities or that Plaintiffs’ expert reviewed those agreements.
<b>Defendant Meta Platforms, Inc.’s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Tilman Klumpp, Exhibit 1, Excerpts of Expert Merits Report of Tilman Klumpp, Ph.D., dated Jan. 12, 2024</b>			
24	878-2	77 ¶ 151, between “others at Facebook, writing:” and “In the same e-mail, Ms. Chang	Old – from 2013 and 2014

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
		advised that;” between “In the same e-mail, Ms. Chang advised that” and “Ms. Chang testified that;” and after “Zuckerberg on April 30, 2014”	
25	878-2	79-80 ¶ 157, after “— expressly addresses”	Old – the effective date of the agreement being discussed was January 15, 2012 and it was later amended in July 2017
26	878-2	80 ¶ 158, after “Microsoft agreed as follows:”	Old – the effective date of the agreement being discussed is May 2012
27	878-2	80 ¶ 158 n.353, before “PALM-008914036-056”	Old – the effective date of the agreement being discussed is May 2012
28	878-2	81 ¶ 159, between “Microsoft agreed to” and “With this agreement in place”	Old – the effective date of the agreement being discussed is May 2012
29	878-2	82 ¶ 164 n.357, between “a January 28, 2015” and “(See PALM-007633377-379.)”	Old – the effective date of the agreement being discussed is in 2015
30	878-2	82-83 ¶ 165 n.358, between “following termination provision:” and “(See PALM-002014487-535”	Old – the effective date of the agreement being discussed is in 2015
31	878-2	84 ¶ 167 n.360, between “at 266” and “PALM-ADI-0001000836-837”	Old – the effective date of the agreement being discussed is in 2013
32	878-2	84-85 ¶ 169 n. 361, between “internal Facebook email describing” and “Bell, K. (January 25;” and after “PALM-FTC-00968368”	Old – from 2019  Public: <a href="https://www.nytimes.com/2019/01/25/technology/facebook-instagram-whatsapp-messenger.html">https://www.nytimes.com/2019/01/25/technology/facebook-instagram-whatsapp-messenger.html</a>
33	878-2	85-86 ¶ 170, between “Directors presentation noted that” and image of “2019 Product Strategy”	Old – from 2018
34	878-2	85-86 ¶ 170, image snip between “and social infrastructure.” and “Source: PALM-FTC-00968366-404”	Old – from 2018 discussing 2019 strategy
35	878-2	85-86 ¶ 170 n.364, after “see PALM-FTC-00967935), at 366”	Old – from 2018

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36	878-2	87-88 ¶ 173, image between “MARCH 2019” and “Source: PALM-006189416-420”	Old – from 2019
<b>Defendant Meta Platforms, Inc.’s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Tilman Klumpp, Exhibit 2, Excerpts of Transcript of Deposition of Tilman Klumpp, held on Mar. 5, 2024</b>			
37	878-3	289:7, between “irrational for Facebook to” and “in -- to make that decision”	Old – from 2018
<b>Defendant Meta Platforms, Inc.’s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Markus Jakobsson, Exhibit 1, Excerpts of Expert Merits Report of Markus Jakobsson, Ph.D., dated Jan. 12, 2024</b>			
38	880-2	20-21 ¶ 57, between “had developed a so-called” and “architecture in which Onovo-installed;” between “so that Onovo’s” and “As a Facebook engineer explained;” and after “and Ken Rudin:”	Old – from 2017  Public: <a href="https://en.wikipedia.org/wiki/Man-in-the-middle_attack">https://en.wikipedia.org/wiki/Man-in-the-middle_attack</a>  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
39	880-2	22 ¶ 60, after “behavioral information such as”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
40	880-2	24 ¶ 68, between “specific in-app analytics—” and “— that he believed would”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
41	880-2	24-25 ¶ 68, image snip between “figure out how to do this” and “PX 2255 at PALM-016564836”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws



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42	880-2	25-26 ¶ 70, between “URLs are unfortunately uninformative.” and “That said—we are”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
43	880-2	35 ¶ 94, image between “companies’ valuable analytics.” and “PX 414 at 6”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
44	880-2	48 ¶ 125, image snip between ““a good job there.” and “PX 1747 at PALM-017114236”	Old – from 2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
45	880-2	50 ¶ 129, image snip between “Sending message” and “We used it to measure”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
46	880-2	52-53 ¶ 133, between “Amazon Ads metrics including” and “PX 2256 at PALM-012863801 (Jan. 2019 IAAP Technical Analysis),” encompassing image; and image between “PX 2256 at PALM-012863801 (Jan. 2019 IAAP Technical Analysis)” and “PX 1208 at PALM-014364032-33”	Old – from 2018-2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
47	880-2	53 ¶ 134, between “YouTube, including” and image beginning “YouTube what data is sent back;” and	Old – from 2019  There is a significant public interest in this conduct, which involves direct targeting of



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		image snip between “video_type (ad or content)” and “PX 2256 at PALM-012863800 (Jan. 2019 IAAP Technical Analysis)”	competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
48	880-2	54-55 ¶ 138, image between “PALM-016895582 at 5584-85” and “Id. at PALM-016895585”	Old – from 2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
<b>Defendant Meta Platforms, Inc.’s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Markus Jakobsson, Exhibit 2, Excerpts of Rebuttal Expert Merits Report of Markus Jakobsson, Ph.D., dated Feb. 9, 2024</b>			
49	880-3	23 ¶ 62 n.25, after “(Zuckerberg, Jun. 2016:”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
50	880-3	24 ¶ 63, between “You should figure out how to do this.” and “This seems like an important”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
51	880-3	25-26 ¶ 66, between “unfortunately uninformative.” and “That said—we are”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
52	880-3	27-28 ¶ 71, image after “this at enough detail . . . .”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
53	880-3	33-34 ¶ 77, image after “of	Old – from 2017

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		IAAP-derived data”	There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
54	880-3	34-35 ¶ 78, after “Patel, and others, explained:”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
55	880-3	35-36 ¶ 79, between “propose that Facebook” and “The second option is;” and between “The second option is” and “by Naveh, Priell,”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
56	880-3	36-37 ¶ 80, between “In particular, the first option—” and “—is something that no legitimate”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
57	880-3	37 ¶ 81, between “option—the one” and “by Erez Naveh;” and after “team recommends that Facebook”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
58	880-3	37 ¶ 82, between “I refer to” and “that Facebook’s Erez Naveh;” between “‘zero day’ because a” and “that would allow a developer like Facebook to;” and between “that would allow a developer like Facebook to” and “to avoid certificate pinning”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws

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59	880-3	38 ¶ 84, between “Naveh and Priell” and “that if Snapchat implements;” and between “its analytics, Facebook” and “, all so that Facebook can continue”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
60	880-3	38 ¶ 85, between “their recommended option—” and “However, as a ‘Con,’ they recognize that;” and after ““However, as a ‘Con,’ they recognize that”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
61	880-3	38-39 ¶ 86, between “involv[ing]’ in the” and “in their August 29”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
62	880-3	39-40 ¶ 87, between “Priell about 30 days prior:” and “The fact that Facebook would”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
63	880-3	40 ¶ 88, after “discussion that included the following:”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
64	880-3	41 ¶ 90, between “suspect acts, including” and “in order to continue Facebook’s”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
65	880-3	48 ¶ 108, between “dollars to deploy it, and then” and	Old – from 2017

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
		“when this bespoke technical”	There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
66	880-3	52 ¶ 115, between “the Snapchat app, including” and “—was, according to the”	Old – from the class period ending in 2020  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
67	880-3	53 ¶ 117, image after “in the same document:”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
68	880-3	59-60 ¶ 139, between “recommended that Facebook” and “as a response to potential certificate”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
<b>Defendant Meta Platforms, Inc.’s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Markus Jakobsson, Exhibit 3, Excerpts of Advertiser Plaintiffs’ Responses and Objections to Meta Platforms, Inc.’s Fifth Set of Interrogatories to Advertiser Plaintiffs</b>			
69	880-4	935:23, between “Role” and “acted as a lead”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion to Exclude Expert Testimony and Opinions of Markus Jakobsson</b>			
70	886-1	8:9-11, between “Jakobsson Reb. ¶¶ 57-120.” and “Ex. 36. Dr. Jakobsson”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a

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			monopolist and potentially violates criminal wiretapping laws
71	886-1	8:12-14, between “jury and the Court—” and “, during the Class Period”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
72	886-1	8:18-19, between “program leads recommended” and “to continue the”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
73	886-1	8:21, between “capabilities of Pegasus,” and “ <i>Id.</i> ¶¶ 86-91”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion to Exclude Testimony of Dr. Tilman Klumpp</b>			
74	888-1	13:18-22, between “end-to-end encryption. ¶173.” and “ <i>Id.</i> As part of this”	Old – from 2019
75	888-1	14:2, between “succeeded in making” and “¶173. The finder-of-fact”	Old – from 2019
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment</b>			
76	892-1	1:12, between “restricts Apple’s” and “Ex. 10. And they will”	Old – the effective date of the agreement being discussed was January 15, 2012 and it was later amended in July 2017
77	892-1	2:10, between “expressly restricted Apple’s” and “Ex. 10. The jury will”	Old – the effective date of the agreement being discussed was January 15, 2012 and it was later amended in July 2017
78	892-1	9:15-16, between “(limiting Apple’s” and “Others, too, acknowledged”	Old – the effective date of the agreement being discussed was January 15, 2012 and it was later amended in July 2017
79	892-1	13:25-26 n.5, between “competitively important”	Old – from 2017

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
		and “Exs. 35, 36 at 8435-36, followed by”	There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
80	892-1	17:10-13, between “Apple was restricted from” and “Ex. 10 at 9817; <i>see</i> Ex. 40”	Old – the effective date of the agreement being discussed was January 15, 2012 and it was later amended in July 2017
81	892-1	20:16-17, between “delivered Oct. 2018, showing” and “budget reduction across;” between “content, with a” and “and an additional;” and between “and an additional” and “In 2018, Netflix increased”	Old – from 2018
82	892-1	20:18-19, between “Meta ad spend to a record” and “, Ex. 94 at 0031;”	Old – from 2018
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 1, Expert Merits Report of Michael A. Williams, dated Aug. 5, 2024</b>			
83	892-3	13-14 ¶ 29 n.26, between “an internal email that Facebook” and “(PX 594). On December 3, 2019;” and between “Stephanie Wang wrote that” and “(PALM-016888726-727, at 727)”	Old – from 2018 and 2019  Public: <a href="https://www.facebook.com/business/news/good-questions-real-answers-how-does-facebook-use-machine-learning-to-deliver-ads">https://www.facebook.com/business/news/good-questions-real-answers-how-does-facebook-use-machine-learning-to-deliver-ads</a>  <a href="https://transparency.meta.com/features/explainin-g-ranking/fb-marketplace/">https://transparency.meta.com/features/explainin-g-ranking/fb-marketplace/</a>  <a href="https://generate.nextatlas.com/feed/online-platforms/instagrams-ai-shopping-evolving-e-commerce">https://generate.nextatlas.com/feed/online-platforms/instagrams-ai-shopping-evolving-e-commerce</a>
84	892-3	16 ¶ 34, after “The logs are then processed for:”	Old – from 2010
85	892-3	18-19 ¶ 40, between “Facebook’s advertising strategy of” and “Mr. Jakubowski confirmed”	Old – from 2015
86	892-3	23-24 ¶ 53, after “a 2020 Facebook document states:”	Old – from 2020
87	892-3	38 ¶ 94, between “2013	Old – from 2013

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
		presentation notes that the” and “was generated from local;” between “unsophisticated brands” and “developers and sophisticated brands;” between “developers and sophisticated brands” and “marketers requiring advanced features;” between “marketers requiring advanced features” and “local business;” and after “local business”	
88	892-3	26 ¶ 59, between “FAN accounts for” and “of Facebook’s advertising revenues”	Old – from class period ending in December 2020
89	892-3	69 ¶ 186, between “the meeting brief states:” and “Similarly, in another email exchange”	Old – from 2015
90	892-3	69-70 ¶ 187, after “these business segments as:”	Old – from 2017
91	892-3	69-70 ¶ 187 n.263, between “customers into type,” and “(PALM-008265252, pp. 86-89)”	Old – from 2017
92	892-3	71-72 ¶ 192, between “relevant ads by” and “This means that advertisers can”	Public: <i>See, e.g.,</i> <a href="https://blogs.cornell.edu/info2040/2021/11/03/vc-g-and-how-it-has-revolutionized-facebooks-advertising/">https://blogs.cornell.edu/info2040/2021/11/03/vc-g-and-how-it-has-revolutionized-facebooks-advertising/</a> <a href="https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/">https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/</a>
93	892-3	72 ¶ 193, after “and under it,”	Old – from 2011  Public: <i>See, e.g.,</i> <a href="https://blogs.cornell.edu/info2040/2021/11/03/vc-g-and-how-it-has-revolutionized-facebooks-advertising/">https://blogs.cornell.edu/info2040/2021/11/03/vc-g-and-how-it-has-revolutionized-facebooks-advertising/</a> <a href="https://www.tws-partners.com/2019/12/16/how-">https://www.tws-partners.com/2019/12/16/how-</a>



Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
			<a href="#">facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/</a>
94	892-3	72-73 ¶ 195, after “of bids is calculated by”	Old – from 2011  Public: <i>See, e.g.,</i> <a href="https://madgicx.com/blog/facebook-cpm">https://madgicx.com/blog/facebook-cpm</a>
95	892-3	73 ¶ 196, entire paragraph	Old – from 2012  Public: <i>See, e.g.,</i> <a href="https://madgicx.com/blog/facebook-cpm">https://madgicx.com/blog/facebook-cpm</a>
96	892-3	73 ¶ 197, entire paragraph	Old – from 2011  Public: <i>See, e.g.,</i> <a href="https://madgicx.com/blog/facebook-cpm">https://madgicx.com/blog/facebook-cpm</a>
97	892-3	73 ¶ 198, image between “EQUATION TO ASCERTAIN ROI” and “Source: PALM-010596417”	This is Advertisers’ material which Advertisers are not seeking to seal it
98	892-3	73 ¶ 198 n.274, between “it states that” and “(See PALM-007648629,”	Public: <i>See, e.g.,</i> <a href="https://blogs.cornell.edu/info2040/2021/11/03/vcg-and-how-it-has-revolutionized-facebooks-advertising/">https://blogs.cornell.edu/info2040/2021/11/03/vcg-and-how-it-has-revolutionized-facebooks-advertising/</a>  <a href="https://www.facebook.com/business/help/430291176997542?id=561906377587030">https://www.facebook.com/business/help/430291176997542?id=561906377587030</a>  <a href="https://a.sfdcstatic.com/content/dam/www/ocms/assets/pdf/datasheets/sc_decode-thefacebook-auction.pdf">https://a.sfdcstatic.com/content/dam/www/ocms/assets/pdf/datasheets/sc_decode-thefacebook-auction.pdf</a>
99	892-3	75 ¶ 202, between “based on targeting” and “This strategy is depicted”	Old – from 2013  Public: <i>See, e.g.,</i> <a href="https://blogs.cornell.edu/info2040/2021/11/03/vcg-and-how-it-has-revolutionized-facebooks-advertising/">https://blogs.cornell.edu/info2040/2021/11/03/vcg-and-how-it-has-revolutionized-facebooks-advertising/</a>  <a href="https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/">https://www.tws-partners.com/2019/12/16/how-facebook-ad-auctions-work-and-how-your-bidding-strategy-should-look/</a>
100	892-3	75-77 ¶ 202, image between “REVENUE PER IMPRESSION” and “Source: PALM-	Old – from 2013

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
		005396091;" image between "FACEBOOK PRICING STRATEGY" and "Source: PALM-005396091;" and image between "DETERMINE TRUE VALUE" and "Source: PALM-005396091"	
101	892-3	80-81 ¶ 207, image between "OVER TIME IN THE U.S." and "Source: PALM-014824975"	Old – from 2021
102	892-3	82-83 ¶ 210, after "It was found that"	Old – from 2014
103	892-3	82-83 ¶ 210 n.299, before "See PALM-006846145-154, at 147"	Old – from 2014
104	892-3	83 ¶ 211, between "prices, which was" and "Demand rose because advertisers were," and after "Demand rose because advertisers were"	Old – from 2013
105	892-3	83 ¶ 212, between "growth, stating that" and "The result was contrary;" between "increased prices, the business" and "Thus, the document concluded;" between "[t]his suggests that" and "Such drivers led to;" and after "a later 2018 document, since"	Old – from 2017 to 2018
106	892-3	85-86 ¶ 217, between "own data, more than" and of advertisers on Facebook;" between "purchases in no more than" and "of the available 138 months;" between "Figure 19, more than" and "of advertisers on Facebook;" and between "total ad spend of less than" and "in the entire data"	Old – from 2022 at the latest

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
		period”	
107	892-3	85-86 ¶ 217, image between “THROUGH JUNE 2022” and “Source: Meta, ‘RFP 78 Data,’ PALM-017052724”	Old – from 2022 at the latest
108	892-3	87 ¶ 217, image between “THROUGH JUNE 2022” and “g. <i>Specialized vendors</i> ”	Old – from 2022 at the latest
109	892-3	92-93 ¶ 235, image between “OVER TIME IN THE U.S.” and “Source: PALM-014824975”	Old – from 2022 at the latest
110	892-3	131 ¶ 312, between “social advertising were between” and “To calculate Facebook’s revenue,” and between “is expected to be at least” and “in the period 2017-2020”	Old – from 2017 and providing projections until 2020
111	892-3	131 ¶ 314, after “cap and explained that Facebook’s”	Old – from 2019
112	892-3	152 ¶ 363 n.587, between “produced by Facebook, out of” and “advertisers that purchased ads;” between “in the Class Period, just” and “of those advertisers;” between “Facebook’s stated goal was for the” and “As stated in a Facebook document;” and between “frequency (‘RF’)] is” and “PALM-015191749-754”	Old – from class period ending in December 2020
113	892-3	203 at TABLE A1, Row 11 of Column 1 (PALM-006480355), after “social advertising were between”	Old – from 2017
114	892-3	204 at TABLE A1, Row 17 of Column 1 (PALM-014096958-994), after “from February 2019 notes that”	Old – from 2019
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for</b>			

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
<b>Summary Judgment, Exhibit 2, Expert Report of Michael A. Williams, Ph.D., May 24, 2024</b>			
115	892-3	8 ¶ 17, between “which accounted for” and “of Facebook’s ad revenue”	Old — from class period ending in December 2020
116	892-3	8 ¶ 17, between “ranging from” and “Projections suggested it;” and between “would remain above” and “from 2017-2020”	Old — from 2017 and providing projections until 2020
117	892-3	31 ¶ 66 n.64, between “Facebook, out of” and “advertisers that purchased;” between “the Class Period, just” and “of those advertisers;” between “Facebook’s stated goal was for the” and “As stated in a Facebook document;” and between “margin on [reach and frequency (‘RF’)] is” and “PALM-015191749-754”	Old — from class period ending in December 2020
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 3, Expert Reply Report of Michael A. Williams, Ph.D., dated July 8, 2024</b>			
118	892-3	8-9 ¶ 28 n.24, between “Meta was associated with” and “of the ad spend;” between “targeting is associated with over” and “of ad spend;” between “geographic targeting is associated with over” and “of ad spend;” and between “There is” and “ad spend associated only”	Old — from class period ending in December 2020
119	892-3	9 ¶ 30, between “age targeting was associated with over” and “of ad spend;” and between “geographic targeting was associated with over” and “of ad spend”	Old — from class period ending in December 2020

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
120	892-3	17-18 ¶ 48, image between “FACEBOOK’S COST AND CAPITAL” and “Source: PALM-014824975”	Old – from 2016
121	892-3	19 ¶ 50, between “in order to meet our financial goals,” and “Plaintiffs have not alleged;” and between “evidence indicating) that Meta’s” and “across-the-board cut”	Old – from 2018
122	892-3	19 ¶ 51, between “e-mailed Fidji Simo, cutting nearly” and “from Watch’s budget for;” and between “programming, while adding” and “towards creators and gaming”	Old – from 2018
123	892-3	23 ¶ 51 n.53, between “we suggested considering cutting” and “from originals + sports;” and between “next year and adding” and “towards creators and gaming”	Old – from 2018
124	892-3	34 ¶ 90 n.99, between “FAN ads accounted for” and “of Facebook’s ad revenue”	Old – from class period ending in December 2020
125	892-3	44-45 ¶ 114, image between “CTR INDEX FOR META ADS” and “Source: PALM-014347024”	Old – from 2022 at the latest
126	892-3	55 ¶ 142, between “Class Period is nearly” and “. In addition;” between “. In addition” and “of advertisers purchased at least;” between “of advertisers purchased at least” and “Facebook impressions in;” between “chance that an advertiser that purchased” and	Old – from class period ending in December 2020

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
		“Facebook impressions purchased;” between “by the alleged conduct is over” and “. That is, at least;” between “. That is, at least” and “of advertisers have a more than;” and between “of advertisers have a more than” and “chance of being injured”	
127	892-3	60 ¶ 154, between “points out that Meta budgeted” and “in 2018 for ad coupons;” between “investigation reveals that only” and “was earmarked;” between “Parties’ while” and “was allocated to;” and between “members were less than” and “of Meta’s advertising revenue”	Old – from 2018
128	892-3	60 ¶ 155, between “buying reached as high as” and “during the class period;” between “by Facebook, out of” and “advertisers that purchased ads;” and between “in the Class Period, just” and “of those advertisers only”	Old – from class period ending in December 2020
129	892-3	60 ¶ 155 n.191, between “just stick with staying at” and “of total ad revenue”	Old – from 2015
130	892-3	61 ¶ 157, between “Facebook’s stated goal is” and “Indeed some advertisers use”	Old – from 2018
131	892-3	61 ¶ 157 n.195, between “[reach and frequency (‘RF’)] is” and “PALM-015191749-754”	Old – from class period ending in December 2020
132	892-3	72-75 at Appendix II, all images between “SUPPLEMENTAL	Old – from 2022 at the latest

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
		TABLES AND FIGURES” and “Source: Tucker Report”	
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 4, Expert Merits Report of Tilman Klumpp, Ph.D., dated Jan. 12, 2024</b>			
133	892-5	17-18 ¶ 42, between “In a January 2018” and “In late 2018”	Old – from 2018
134	892-5	17-18 ¶ 42, after “In a 2018 self-review,”	Old – from 2018
135	892-5	41-42 ¶ 87, between “EBDA. And:” and “On June 18 2018”	Old – from 2017
136	892-5	48-49 ¶ 103 n.178, between “Dec. 6, 2016 presentation identifying” and “PALM-005452186-195;” between “Nov. 27, 2017 emails:” and “PALM-005487488-495;” and after “May 25, 2018 Zuckerberg email:”	Old – from 2016 to 2018
137	892-5	49-50 ¶ 105 n.183, between “Dec. 6, 2016 presentation identifying” and “PALM-005452186-195;” and after “Nov. 27, 2017 emails:”	Old – from 2016 to 2018
138	892-5	59-60 ¶ 119, between “Facebook planned to spend nearly” and “in the first part-year;” and after “competitive analysis concluded that”	Old – from 2017
139	892-5	60-61 ¶ 120 n.239, after “PALM-003130978”	Old – from 2018
140	892-5	61-62 ¶ 122, between “Mr. Hastings explained that” and “The same notes advised”	Old – from 2019
141	892-5	73 ¶ 142, after “Microsoft informed Facebook that”	Old – from 2013
142	892-5	73-74 ¶ 143, after “Mr. Vernal agreed, e-mailing:”	Old – from 2013
143	892-5	74 ¶ 144, after “Mr. Daniels	Old – from 2013



Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
		confirmed that”	
144	892-5	74 ¶ 145, between “Facebook that Microsoft wanted” and “, and that a user’s Facebookpk;” between “at Facebook that it was” and “Ms. White replied later;” and after “the same e-mail chain that”	Old – from 2013
145	892-5	76-77 ¶ 151, between “Facebook executives” and “For example, on July 9;” between “others at Facebook, writing:” and “In the same e-mail, Ms. Chang advised that;” between “In the same e-mail, Ms. Chang advised that” and “Ms. Chang testified that;” and after “Zuckerberg on April 30, 2014”	Old – from 2013 and 2014
146	892-5	79-80 ¶ 157, after “— expressly addresses”	Old – the effective date of the agreement being discussed was January 15, 2012 and it was later amended in July 2017
147	892-5	80 ¶ 158, after “Microsoft agreed as follows:”	Old – the effective date of the agreement being discussed is May 2012
148	892-5	80 ¶ 158 n.353, before “PALM-008914036-056”	Old – the effective date of the agreement being discussed is May 2012
149	892-5	81 ¶ 159, between “Microsoft agreed to” and “With this agreement in place”	Old – the effective date of the agreement being discussed is May 2012
150	892-5	82 ¶ 164 n.357, between “a January 28, 2015” and “(See PALM-007633377-379.)”	Old – the effective date of the agreement being discussed is in 2015
151	892-5	82-83 ¶ 165 n.358, between “following termination provision:” and “(See PALM-002014487-535”	Old – the effective date of the agreement being discussed is in 2015
152	892-5	84 ¶ 167 n.360, between “at 266” and “PALM-ADI-0001000836-837”	Old – the effective date of the agreement being discussed is in 2013
153	892-5	84-85 ¶ 169 n. 361, between “internal Facebook email	Old – from 2019

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		describing” and “Bell, K. (January 25;” and after “PALM-FTC-00968368”	Public: <a href="https://www.nytimes.com/2019/01/25/technology/facebook-instagram-whatsapp-messenger.html">https://www.nytimes.com/2019/01/25/technology/facebook-instagram-whatsapp-messenger.html</a>
154	892-5	85-86 ¶ 170, between “Directors presentation noted that” and image of “2019 Product Strategy”	Old – from 2018
155	892-5	85-86 ¶ 170, image snip between “and social infrastructure.” and “Source: PALM-FTC-00968366-404”	Old – from 2018 discussing 2019 strategy
156	892-5	85-86 ¶ 170 n.364, after “see PALM-FTC-00967935), at 366”	Old – from 2018
157	892-5	87-88 ¶ 173, image between “MARCH 2019” and “Source: PALM-006189416-420”	Old – from 2019
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 5, Expert Rebuttal Report of Tilman Klumpp, Ph.D., Feb. 9, 2024</b>			
158	892-5	31-32 ¶ 76, between “own internal documents recognize that” and “It is also true that, in economics”	Old – from 2016 and 2017
159	892-5	31-32 ¶ 76 n.79, between “‘CRD update’ presentation stating” and “PALM-005484912 at 921”	Old – from 2016
160	892-5	49 ¶ 119, between “Stories ads increased from” and “in 2017 to;” between “in 2017 to” and “in 2020’ and that;” between “Stories ads increased from” and “in 2017 to;” and between “in 2017 to” and “in 2020.’ He then”	Old – from 2017 to 2020
161	892-5	50 ¶ 122, between “indicates that Facebook was” and “during the Class Period”	Old – from 2016 and 2018
162	892-5	50 ¶ 122 n.143, between	Old – from 2016 and 2018

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
		“PALM-010815939 at 940” and “PALM-002996507 at slide 20;” and after “PALM-002996507 at slide 20”	
163	892-5	50-51 ¶ 123, between “CPM for these advertisers and ads” and “Dr. Tadelis’ Exhibit 4 does”	Old – from 2018
164	892-5	71 ¶ 170, between “Meta AN contributed” and “of Facebook’s total ad inventory”	Old – from before 2018
165	892-5	71-72 ¶ 171, between “fluctuated between approximately” and “(roughly consistent with the figure;” between “continued to fall, reaching” and “of Facebook’s total impressions;” and image between “TOTAL FACEBOOK AD IMPRESSIONS” and “Source: PALM-017138970”	Old – from 2022 at the latest
166	892-5	72-73 ¶ 172, between “it still fell from approximately” and “in the months leading up;” between “to the GNBA to about” and “in the months after;” and image between “TOTAL FACEBOOK AD REVENUE” and “Source: PALM-017138970”	Old – from 2022 at the latest
167	892-5	73-74 ¶ 173, between “this share was below” and “while it had not been;” between “while it had not been” and “in at any time within;” and between “TOTAL FACEBOOK AD CLICKS” and “Source: PALM-017138970”	Old – from 2022 at the latest

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168	892-5	81 ¶ 189 n.258, after “PALM-016717997 (5/24/2018)”	Old – from 2018
169	892-5	81-82 ¶ 190, between “Facebook would have needed” and “Google’s documents further indicate”	Old – last edited in 2019
170	892-5	81-82 ¶ 190 n.262, between “See PALM-015703568 at 71-72” and “Emphasis in original”	Old – last edited in 2019
171	892-5	87-88 ¶ 202, after “June 14, 2018 Facebook document”	Old – from 2018
172	892-5	88 ¶ 204, after “tax on transactions—in fact,”	Old – from 2018
173	892-5	91 ¶ 210, between “eventually signing the GNBA,” and “With the GNBA”	Old – from 2016
174	892-5	93-94 ¶ 215, between “Facebook’s internal documents make clear” and “Third, when Facebook signed”	Old – from 2019
175	892-5	93-94 ¶ 215 n.301, between “PALM-013771480 (4/15/2019)” and “emphasis added); PALM-013541405;” and after “emphasis added); PALM-013541405”	Old – from 2019
176	892-5	96 ¶ 220, after “strategy at the time) reply as follows:”	Old – from 2018
177	892-5	96 ¶ 221, between “quote provided by Dr. Tadelis:” and “Ms. Simo further explains that;” and after “Ms. Simo further explains that”	Old – from 2018
178	892-5	96 ¶ 221 n.314, between “PALM-005950959-966 at 963” and “See also”	Old – from 2018
179	892-5	97 ¶ 222, between “less likely for Facebook to” and	Old – from 2018

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
		"I interpret Ms. Simo's response"	
180	892-5	97 ¶ 223, between "Sandberg, stating that" and "Dr. Tadelis puts forth no"	Old – from 2018
181	892-5	98 ¶ 225, after "that's where the demand was,"	Old – from 2018
182	892-5	98 ¶ 226, after "belying Mr. Edie's claim that"	Old – from 2018
183	892-5	98-99 ¶ 227, after "This belies Mr. Eide's claim that"	Old – from 2018
184	892-5	99 ¶ 229, between "reduce the budget for original content and" and "improved user engagement;" and between "document suggesting that such" and "Moreover, as discussed in Section III"	Old – from 2018
185	892-5	110 ¶ 254, between "to 2017 represents only" and "of 2017 ad spend;" and between "2018 represents only" and "of 2018 ad spend on"	Old – from 2016 to 2018
186	892-5	110 ¶ 255, between "data and calculations, the" and "figures he discusses are based on a;" between "figures he discusses are based on a" and "increase in Netflix ad spend;" between "from 2016 to 2017 and a" and "increase in Netflix ad spend;" between "Facebook in 2017 and 2018—" and "respectively—shows;" between "Netflix's ad spend accounted for" and "of the total spend on ad venues;" between "market in 2017, and for" and "in 2018. Moreover, if the;" between	Old – from 2016 to 2018

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
		“in 2018. Moreover, if the” and “Netflix spent on advertising;” and between “would have amounted to between” and “of revenue increase”	
187	892-5	116-17 ¶ 270, between “A January 28, 2015” and “All of these features would”	Old – from 2015
188	892-5	128 ¶ 303, between “injected by F3 for CTR_MBL_FEED” and “Dr. Tadelis cites a second;” between “which explains that” and “I do not know if ;” between “I do not know if” and “whether ‘features backfilled;” between “most features of F3, or what” and “refers to;” between “as measured by Meta’s” and “they only support a finding of a;” between “they only support a finding of a” and “and only for;” and after “and only for”	Old – from 2018
189	892-5	129 ¶ 306 n.431, after “removing duplicative features’,”	Old – from 2018
190	892-5	135-36 ¶ 319 n.450, after “See PALM-FTC-00967935), at 366”	Old – from 2018

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<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 6, Expert Merits Report of Markus Jakobsson, Ph.D., dated Jan. 12, 2024</b>			
191	892-7	20-21 ¶ 57, between “had developed a socalled” and “architecture in which Onavo-installed;” between “so that Onavo’s” and “As a Facebook engineer explained;” and after “and Ken Rudin:”	Old – from 2017  Public: <a href="https://en.wikipedia.org/wiki/Man-in-the-middle_attack">https://en.wikipedia.org/wiki/Man-in-the-middle_attack</a>  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
192	892-7	22 ¶ 60, after “behavioral information such as”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
193	892-7	24 ¶ 68, between “specific in-app analytics—” and “—that he believed would”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
194	892-7	24-25 ¶ 68, image snip between “figure out how to do this” and “PX 2255 at PALM-016564836”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
195	892-7	25-26 ¶ 70, between “URLs are unfortunately uninformative.” and “That said—we are”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
196	892-7	35 ¶ 94, image between “companies’ valuable analytics.” and “PX 414 at 6”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of



Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
			competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
197	892-7	48 ¶ 125, image snip between ““a good job there.” and “PX 1747 at PALM-017114236”	Old – from 2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
198	892-7	50 ¶ 129, image snip between “Sending message” and “We used it to measure”	Old – from 2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
199	892-7	52-53 ¶ 133, between “Amazon Ads metrics including” and “PX 2256 at PALM-012863801 (Jan. 2019 IAAP Technical Analysis),” encompassing image; and image between “PX 2256 at PALM-012863801 (Jan. 2019 IAAP Technical Analysis)” and “PX 1208 at PALM-014364032-33”	Old – from 2018 and 2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
200	892-7	53 ¶ 134, between “YouTube, including” and image beginning “YouTube what data is sent back;” and image snip between “video_type (ad or content)” and “PX 2256 at PALM-012863800 (Jan. 2019 IAAP Technical Analysis)”	Old – from 2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
201	892-7	54-55 ¶ 138, image between “PALM-016895582 at 5584-85” and “Id. at PALM-016895585”	Old – from 2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal

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			wiretapping laws
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 7, Rebuttal Expert Merits Report of Markus Jakobsson, Ph.D., Feb. 9, 2024</b>			
202	892-7	23 ¶ 62 n.25, after "(Zuckerberg, Jun. 2016:"	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
203	892-7	24 ¶ 63, between "You should figure out how to do this." and "This seems like an important"	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
204	892-7	25-26 ¶ 66, between "unfortunately uninformative." and "That said—we are"	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
205	892-7	27-28 ¶ 71, image after "this at enough detail . . . ."	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
206	892-7	33-34 ¶ 77, image after "of IAAP-derived data"	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
207	892-7	34-35 ¶ 78, after "Patel, and others, explained:"	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
208	892-7	35-36 ¶ 79, between "propose that Facebook" and "The second option is;"	Old – from 2017

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
		and between “The second option is” and “by Naveh, Priell,”	There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
209	892-7	36-37 ¶ 80, between “In particular, the first option—” and “—is something that no legitimate”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
210	892-7	37 ¶ 81, between “option—the one” and “by Erez Naveh;” and after “team recommends that Facebook”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
211	892-7	37 ¶ 82, between “I refer to” and “that Facebook’s Erez Naveh;” between “‘zero day’ because a” and “that would allow a developer like Facebook to;” and between “that would allow a developer like Facebook to” and “to avoid certificate pinning”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
212	892-7	38 ¶ 84, between “Naveh and Priell” and “that if Snapchat implements;” and between “its analytics, Facebook” and “, all so that Facebook can continue”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
213	892-7	38 ¶ 85, between “their recommended option—” and “However, as a ‘Con,’ they recognize that;” and after “‘However, as a ‘Con,’ they recognize that”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
214	892-7	38-39 ¶ 86, between “involv[ing]’ in the” and “in their August 29”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a

Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
			monopolist and potentially violates criminal wiretapping laws
215	892-7	39-40 ¶ 87, between “Priell about 30 days prior:” and “The fact that Facebook would”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
216	892-7	40 ¶ 88, after “discussion that included the following:”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
217	892-7	41 ¶ 90, between “suspect acts, including” and “in order to continue Facebook’s”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
218	892-7	48 ¶ 108, between “dollars to deploy it, and then” and “when this bespoke technical”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
219	892-7	52 ¶ 115, between “the Snapchat app, including” and “—was, according to the”	Old – from the class period ending in 2020  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
220	892-7	53 ¶ 117, image after “in the same document:”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
221	892-7	59-60 ¶ 139, between “recommended that Facebook” and “as a response to potential certificate”	Old – from 2017  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a

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			monopolist and potentially violates criminal wiretapping laws
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 10</b>			
222	892-9	Entire document	Old – the effective date of the agreement is 2012
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 11</b>			
223	892-9	Entire document	Old – from 2019
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 13, PX-2857 Priell Deposition</b>			
224	892-9	Entire document	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 14, PX-414 Olivan Deposition</b>			
225	892-9	PALM-010629831-832, content of "Friday, July 22, 2016 8:33 AM" email below subject line "A/C Priv - Onavo Research Taskforce Status Update"	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
226	892-9	Email addresses of Meta employees as highlighted in exhibit	Unopposed
227	892-9	1-6, entire slides with notes following "Document produced only in native format."	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 15, PX-2256 Zuckerberg Deposition</b>			
228	892-9	PALM-012863800 between "everything we collected is still there" and "Per App/Dataset Info"	Old – from 2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
229	892-9	PALM-012863800 between "video_type (ad or content)" and "Snapchat"	Old – from 2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a

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			monopolist and potentially violates criminal wiretapping laws
230	892-9	PALM-012863801 before “We used it to measure”	Old – from 2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
231	892-9	PALM-012863801 between “raw form by MS team and others” and “Summary of types of analyses conducted”	Old – from 2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
232	892-9	PALM-012863802-823, everything after “Appendix: VPNLess - VPNLess.key Contact Support”	Old – from 2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 16</b>			
233	892-9	Email addresses of Meta employees as highlighted in exhibit	Unopposed
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 18, PX-2255 Zuckerberg Deposition</b>			
234	892-9	Email addresses of Meta employees as highlighted in exhibit	Unopposed
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 19, PX-2984 Zervas Deposition</b>			
235	892-9	Entire document	Old – from 2017
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 20, PX-2861 Priell Deposition</b>			
236	892-9	Email addresses of Meta employees as highlighted in exhibit	Unopposed
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 21</b>			
237	892-10	Entire document	Old – from 2017
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 24, PX-557 Schultz Deposition</b>			
238	892-10	PALM-014640333-338, between “DAVOS - GOVERNMENT	Old – from 2016



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		MEETINGS” and “Other Meetings”	
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 26</b>			
239	892-10	Entire document	Old – from 2018, goals for 2020
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 28</b>			
240	892-10	Email addresses of Meta employees as highlighted in exhibit	Unopposed
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 29, PX-116 Parikh Deposition</b>			
241	892-10	Email addresses of Meta employees as highlighted in exhibit	Unopposed
242	892-10	PALM-012927516, between “Pedro Canahuati (1/30/2019 11:38:19 PST):” and “Pedro Canahuati (1/30/2019 11:38:32 PST);” between “Pedro Canahuati (1/30/2019 11:38:32 PST):” and “Jay Parikh (1/30/2019 11:39:13 PST);” and between “Pedro Canahuati (1/30/2019 11:39:15 PST):” and “Jay Parikh (1/30/2019 11:39:30 PST):”	Old – from 2019
243	892-10	PALM-012927516, between “Jay Parikh (1/30/2019 11:39:40 PST):” and “Jay Parikh (1/30/2019 11:40:18 PST):”	Old – from 2019
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 32, PX-2215 Naveh Deposition</b>			
244	892-10	Email addresses of Meta employees as highlighted in exhibit	Unopposed
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 34 PX-1747 Wei Deposition</b>			
245	892-10	Email addresses of Meta employees as highlighted in exhibit	Unopposed
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 36</b>			
246	892-10	Entire document	Old – from 2017



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<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 40</b>			
247	892-10	Entire document	Old – the effective date of the agreement is in 2017
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 41</b>			
248	892-11	Entire document	Old – the effective date of the agreement is in 2015
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 42</b>			
249	892-11	Entire document	Old – from 2019
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 43</b>			
250	892-11	Entire document	Old – from 2018
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 44</b>			
251	892-11	Entire document	Old – the effective date of the agreement is in 2013
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 45</b>			
252	892-11	Entire document	Old – the effective date of the agreement is in 2014
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 46</b>			
253	892-11	Entire document	Old – from 2019
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 47</b>			
254	892-11	Entire document	Old – from 2019
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 48</b>			
255	892-11	Entire document	Old – from 2018
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 49</b>			
256	892-11	Entire document	Old – from 2015
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 50</b>			
257	892-11	Entire document	Old – the effective date of the agreement is in 2016
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 51</b>			
258	892-11	Entire document	Old – the effective date of the agreement is in 2019
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 52</b>			
259	892-11	Entire document	Old – the effective date of the agreement is in 2016
<b>Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 53</b>			

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260	892-11	Entire document	Old – the effective date of the agreement is in 2018
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 54</b>			
261	892-11	Entire document	Old – the effective date of the agreement is in 2019
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 55</b>			
262	892-11	Entire document	Old – the effective date of the agreement is in 2019
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 56</b>			
263	892-11	Entire document	Old – the effective date of the agreement is in 2017
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 57</b>			
264	892-11	Entire document	Old – the effective date of the agreement is in 2015
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 58</b>			
265	892-11	Entire document	Old – the effective date of the agreement is in 2015
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 59</b>			
266	892-11	Entire document	Old – the effective date of the agreement is in 2013
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 61 PX-1322 Chang Deposition</b>			
267	892-12	Entire document	Old – from 2017
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 63</b>			
268	892-12	PALM-012438856-858, between “Section 2: The Standard Terms of the Company’s Agreements or licenses with Application Developers” and “Section 3: Integration Partnerships”	No proprietary and confidential business information and contains necessary background for any member of the public seeking to read and understand the Court’s orders.
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 64</b>			
269	892-12	Entire document	Old – from 2013
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 65</b>			
270	892-12	Entire document	Old – from 2015
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 67</b>			
271	892-12	Entire document	Old – from 2017
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 68</b>			

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272	892-12	Entire document	Old – from 2019
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 70 PX-1295 Jakubowski Deposition</b>			
273	892-12	Entire document	Old – from 2017
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 71</b>			
274	892-12	Entire document	Old – from 2017
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 72, PX-1711 Crum Deposition</b>			
275	892-12	Email addresses of Meta employees as highlighted in exhibit	Unopposed
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 73, PX-1712 Crum Deposition</b>			
276	892-12	Entire document	Old – from 2017
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 74, PX-1922 Sandberg Deposition</b>			
277	892-12	Entire document	Old – from 2018
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 75, PX-1921 Sandberg Deposition</b>			
278	892-12	Email addresses of Meta employees as highlighted in exhibit	Unopposed
279	892-12	PALM-006209593, between “We’ve negotiated a partnership with” and “We’re nearly ready to sign;” and between “Here’s a high-level summary” and “-Dan” of “March 16, 2018 12:34 PM” email	Old – from 2018
280	892-12	PALM-006209594, between “Today” and “AN is sub scale because it;” and between “Future” and “How do we sclae to achieve goal” of “February 27, 2018 at 4:33 AM” email	Old – from 2018
281	892-12	PALM-006209594, between “(and get our fair share of publisher ecosystem)” and “of the \$52B publisher ecosystem” of “February 27, 2018 at 4:33 AM” email	Old – from 2018
282	892-12	PALM-006209595, between “Criteo and MediaNet	Old – from 2018, projections for 2020

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		would be launch partners.” and “What happens if we don’t follow recommendation to partner with ad tech” of “February 27, 2018 at 4:33 AM” email	
283	892-12	PALM-006209595-596, between “tax at the end of the first term (3.5 yrs)” and “Partners renege on their contractual obligations;” between “training data for their ad systems.” and “Optics of partnering with Google in market;” between “Optics of partnering with Google in market” and “Contracted payments to Google;” and between “Contracted payments to Google” and “From: Henry Erskine Crum” of “February 27, 2018 at 4:33 AM” email	Old – from 2018
284	892-12	PALM-006209596-597, between “(where the market is growing),” and “of the \$52B publisher ecosystem;” and between “and the monetary investment required for (2).” and “Thanks! -- Henry” of “February 26, 2018 at 23:42” email	Old – from 2018
285	892-12	PALM-006209600-613, entire slides	Old – from 2018
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 81</b>			
286	892-13	PALM-011831167-168 ¶ 6, after “Re-Authorization of Equity Subcommittee Delegation”	Old – from 2016
287	892-13	PALM-011831168-169 ¶ 7, after “Equity Pool Evergreen Increase”	Old – from 2016
288	892-13	PALM-011831171 at	Old – from 2016

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		Exhibit A, after “Approved Expenditures”	
289	892-13	PALM-011831190, row 4 of column 5 (Reed Hastings), below “Netflix”	Old – from 2016
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 83</b>			
290	892-13	PALM-016986654-655, between “here’s what they want from us,” and “Susan” of “February 18, 2015 at 7:04 PM” email	Old – from 2015
291	892-13	Email addresses of Meta employees as highlighted in exhibit	Unopposed
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 92</b>			
292	892-13	Entire document	Old – from 2018 regarding 2019
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 93</b>			
293	892-13	Entire document	Old – from 2018 regarding 2019
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 94</b>			
294	892-13	Entire document	Old – from 2016 to 2018 regarding 2019
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 95, PX-412 Olivan Deposition</b>			
295	892-13	Email addresses of Meta employees as highlighted in exhibit	Unopposed
296	892-13	PALM-014546138, between “we learned of two key blockers:” and “We believe that the majority of” of “January 30, 2019 at 10:10 PM” email	Old – from 2019
297	892-13	PALM-014546139, between “From my side, I think the main issues are:” and “In terms of performance” of “January 30, 2019 at 1:37 PM” email	Old – from 2019
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 96, PX-1926 Sandberg Deposition</b>			
298	892-13	Entire document	Old – from 2019
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 97</b>			

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299	892-12	Entire document	Old – from 2017 to 2018
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 99</b>			
300	892-13	Entire document	Old – from 2019
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 100, PX-119 Parikh Deposition</b>			
301	892-13	Entire document	Old – from 2020
<b>Advertiser Plaintiffs’ Opposition to Defendant Meta Platforms, Inc.’s Motion for Summary Judgment, Exhibit 105</b>			
302	892-14	2, between “specific in-app analytics—” and “—that he believed it would be”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
303	892-14	3, image snip between “You should figure out how to do this” and “PALM-016564836”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
304	892-14	3, image snip between “This is really important” and “/or let us install a really heavy”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
305	892-14	6, image snip between “specialized tools (like Wireshark)” and “PX 414 at 1”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
306	892-14	7, image between “companies’ valuable analytics. <i>Id.</i> ” and “PX 414 at 6”	Old – from 2016  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
307	892-14	11, left image snip between “Sending message” and “We used it to measure”	Old – from 2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a



Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
			monopolist and potentially violates criminal wiretapping laws
308	892-14	11, right image snip between “video_type (ad or content)” and “PX 1205 at 2-3 (Snapchat); id. at 2 (YouTube)”	Old – from 2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
309	892-14	11, image between “PX 1205 at 2-3 (Snapchat); id. at 2 (YouTube)” and “PX 1205 at 3”	Old – from 2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
310	892-14	14, image above “Id. at 3”	Old – from 2019  There is a significant public interest in this conduct, which involves direct targeting of competition through illegitimate means by a monopolist and potentially violates criminal wiretapping laws
<b>Defendant Meta Platforms, Inc.’s Reply in Support of Motion to Exclude Expert Testimony and Opinions of Tilman Klumpp, Exhibit 3, Excerpts of Expert Merits Report of Tilman Klumpp, Ph.D., dated Jan. 12, 2024</b>			
311	901-2	77 ¶ 151, between “others at Facebook, writing:” and “In the same e-mail, Ms. Chang advised that;” between “In the same e-mail, Ms. Chang advised that” and “Ms. Chang testified that;” and after “Zuckerberg on April 30, 2014”	Old – from 2013 and 2014
312	901-2	84 ¶ 167 n.360, between “at 266” and “PALM-ADI-0001000836-837”	Old – the effective date of the agreement is in 2013
<b>Defendant Meta Platforms, Inc.’s Reply in Support of Motion to Exclude Expert Testimony and Opinions of Tilman Klumpp, Exhibit 4, Excerpts of Transcript of Deposition of Tilman Klumpp, held on Mar. 5, 2024</b>			
313	901-3	289:7, between “irrational for Facebook to” and “in -- to make that decision”	Old – from 2018
<b>Defendant Meta Platforms, Inc.’s Reply in Support of Motion for Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 12, Excerpts of Expert Merits Report of Michael A. Williams, Ph.D., dated Aug. 5, 2024</b>			
314	903-2	92-93 ¶ 235, image between	Old – from 2021



Row No.	Dkt. No.	Portion of Document Sought to Be Sealed, If Applicable	Basis for Not Sealing
		“OVER TIME IN THE U.S.” and “Source: PALM-014824975”	
<b>Defendant Meta Platforms, Inc.’s Reply in Support of Motion for Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 15, Excerpts of Transcript of Deposition of Tilman Klumpp, held on Mar. 5, 2024</b>			
315	903-5	277:16-18, between “Microsoft agreement that says that” and “ Well, there is -- so this”	Old – the effective date of the agreement is in 2012
316	903-5	289:7, between “irrational for Facebook to” and “in -- to make that decision”	Old – from 2018

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 18, 2025, in Austin, Texas.

/s/ Brian J. Dunne  
Brian J. Dunne